

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

United States Courts  
Southern District of Texas  
**FILED**

**JUN 22 2017**

David J. Bradley  
Clerk of Court

**UNITED STATES OF AMERICA**

**v.**

**MARQ VINCENT PEREZ**

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§

**Criminal No. 6:17-cr-35-S1**

**SUPERSEDING INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT ONE**

**18 U.S.C. § 247(a)(1) and § 2  
Hate Crime – Damage to Religious Property**

On or about January 28, 2017, in the Southern District of Texas and within the jurisdiction of the Court, the Defendant,

**MARQ VINCENT PEREZ,**

aided, abetted, and assisted by others known and unknown to the Grand Jury, through the use of a dangerous weapon, explosive, and fire, intentionally defaced, damaged, and destroyed religious real property, because of the religious character of the property, to wit: the Victoria Islamic Center, and such offense was in and affected interstate and foreign commerce.

In violation of 18 U.S.C. § 247(a)(1) and § 2.

**COUNT TWO**

**18 U.S.C. § 844(h) and § 2  
Use of Fire to Commit a Federal Felony**

On or about January 28, 2017, in the Southern District of Texas and within the jurisdiction of the Court, the Defendant,

**MARQ VINCENT PEREZ,**

aided, abetted, and assisted by others known and unknown to the Grand Jury, knowingly used a

fire and explosive to commit a violation of 18 U.S.C. § 247(a)(1), as set forth in Count One of this Superseding Indictment, a felony prosecutable in a court of the United States.

In violation of 18 U.S.C. § 844(h) and § 2.

**COUNT THREE**

**26 U.S.C. § 5841, § 5845, § 5861(d), § 5871, and 18 U.S.C. § 2  
Possession of Unregistered Destructive Device**

On or about January 15, 2017, in the Southern District of Texas and within the jurisdiction of the Court, the Defendant,

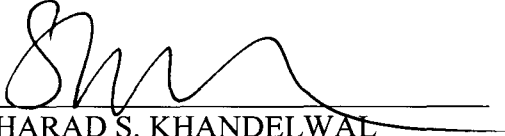
**MARQ VINCENT PEREZ,**

aided, abetted, and assisted by others known and unknown to the Grand Jury, knowingly received and possessed an unregistered firearm, to wit a destructive device, not registered to him in the National Firearms Registration and Transfer Record.

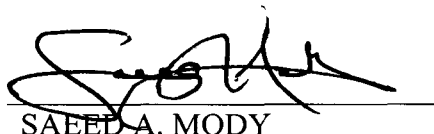
In violation of 26 U.S.C. § 5841, § 5845, § 5861(d), § 5871, and 18 U.S.C. § 2.

A TRUE BILL:  
ORIGINAL SIGNATURE ON FILE  
FOREPERSON OF THE GRAND JURY

ABE MARTINEZ  
ACTING US ATTORNEY  
SOUTHERN DISTRICT OF TEXAS

  
SHARAD S. KHANDELWAL  
EUN KATE SUH  
Assistant United States Attorneys

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ACTING ASST. ATTORNEY GENERAL  
U.S. DEPT. OF JUSTICE, CIVIL RIGHTS DIV.

  
SAEED A. MODY  
Trial Attorney